

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of:	)	
	)	
	)	
Streamlining Licensing Procedures	)	IB Docket No. 18-86
for Small Satellites	)	
	)	

**Reply Comment of the Commercial Spaceflight Federation**

7-August-2018

The Commercial Spaceflight Federation submits these reply comments regarding the above notice of proposed rulemaking filed by the Federal Communications Commission. As will be discussed, our members, who together are examples of many different facets of the satellite industry and who thus who hold great interest in perfecting the proposed streamlined licensing procedure for small satellites, offer with respect, these reply comments to aid the industry as a whole in this effort.

**THE NUMBER OF APPLICATIONS ALLOWED PER ORGANIZATION SHOULD BE INCREASED**

Having read the comments which came in response to the proposed NPRM, the Commercial Spaceflight Federation disagrees with some responses and the Commission's proposal to impose a limit of only one application per organization per 10 spacecrafts/satellites for the new streamlined part 25 license. We disagree that limiting the number of applications allowed per satellite provider would aid the Commission any more in expediting the Part 25 procedure, and

advocate that there be at least 10 satellites per application and that there be no limit to the number of applications per organization.

Other comments suggested that companies who want to launch more than 10 in their constellation do so under a regular part 25 license which accounts for long term operations including full constellations and satellite replenishments, as well as multiple applications. The problem with this notion is that it does not account for growth of smaller commercial satellite companies who do not have an immediate need for this type of license, and who cannot afford to commit to such a license. If this is the solution the commission comes to, we would like to reiterate, that the Commission should consider including a simple transition path from this new licensing regime to a regular Part 25 License when the operator is ready for long term operations.

In addition, besides the above three mentioned comments, many of the others who submitted response agreed with our sentiment. We would like to reaffirm the importance of allowing more than one application of ten satellites in order to encourage industry for smaller satellite businesses as well as innovation. Allowing more than one application will not slow down licensing procedures if the proposed streamlined licensing procedure operates in the way it is intended to.

## **FEE STRUCTURE FOR PROPOSED STREAMLINED PROCEDURE**

Many of our members found issue with the proposed fee structure for the Part 25 licensing regime, especially when taking into consideration the large amount of education based satellites which would be filed under this procedure. This is also a large issue considering the unintended consequences of such a high fee structure on the economic margins associated with commercial small satellite organizations and businesses. After reading the comments to the recent NPRM, we would like to elaborate more on this topic as we offered no specific suggestions surrounding it other that problems should be taken into account. In the interest of our Research and Education Affiliates we agree with that of the educational institutions who provided comment on the NPRM that the \$30,000 fee is far too high especially given that previously educational satellites were filed under an experimental license which only cost them \$70, resulting in a 600-fold increase in fee.

We advocate that the fee structure in the existing part 5 licensing structure for experimental and demo satellites should remain, or that the proposed fee structure for the streamlined Part 25 procedure at least be re-adjusted to account for this dramatic increase in fee.

### **PROPULSION REQUIREMENT ABOVE 400 MILES**

The NPRM stated a requirement of propulsion for satellites over 400 miles, which we disagree with. Most who provided comment on this component of the NPRM agreed with us, and we would like to reiterate in these reply comments the unnecessary nature of this proposed requirement.

### **THE CASUALTY RISK ASSESSMENT SHOULD NOT BE REQUIRED TO BE TRUE ZERO**

From the other stated comments we have all agreed that zero is an overly conservative estimate. CSSI states that “applicants certify that, during the orbital lifetime of each spacecraft, the probability of each satellite’s risk of collision with large objects is less than 0.001. This is consistent with technical requirements developed by NASA for its space missions” CSF agrees with these comments that the probability of collision with a large object should be less than .001.

### **SIZE AND TRACKABILITY**

We sustain that the eligibility requirements proposed by The Commission should be due to mass rather than dimension. There should not be a set dimension limit if those submitting the licensing can insure and prove that it is track-able.

Alba Orbital, Echostar, and CSSMA all agree with us on this point. They cite satellites such as pocketcubes which are smaller than the suggested dimension limit and have been proved to be track-able. If the satellite can provide proof that it meets mass requirements and is in fact track-able, then dimension requirements should not be necessary.

### **USE OF AMATEUR FREQUENCY BANDS**

We are not proposing the use of amateur frequency bands for streamlining processing of Part 25 or Part 5. We think it is important to retain Part 5 license option for experimental and technology demonstration purposes for both education institutions and commercial companies.

## **CONCLUSION**

We would like to thank The Commission for the opportunity to provide comments on the draft NPRM. Many great input was provided from a variety of companies but we would especially like support the comments submitted by the following entities: Analytical Space, Moon Express, and Vector Space. SpaceX abstains from the CSF smallsat comments, and refers any interested parties to SpaceX's public filings.

We would like to offer that if The Commission would like any more insight on the commercial side of the small satellite sector in order to better cater to the needs of the overall industry, that we are more than willing to aid in any way we may be helpful.